

September 6, 2011

Re: Proceeding 99-25 (In the Matter of the Creation of a Low-Power Radio Service)

Dear Chairman Genachowski:

The public interest advocates who are signatories to this letter represent diverse constituencies committed to democratic media policies. Together we commend the Commission for its efforts to ensure spectrum for the nationwide expansion of low power FM radio, as required by the Local Community Radio Act. Low power FM (LPFM) radio is a vital resource for strengthening communities, coordinating emergency response, and facilitating democratic participation.

The Commission's proposed FM translator application processing plan introduced in the Third Further Notice of Proposed Rulemaking aims to ensure sufficient channels for low power FM radio in every Arbitron market. Public interest advocates endorse such a tailored approach to reserving spectrum for low power FM radio. We wish to acknowledge the detailed analysis undertaken by Commission staff to locate available spectrum for low power radio in each Top 150 radio market.

We are concerned, however, that the current plan may not adequately ensure that such channels will be available in urban centers, home to the most populous and diverse neighborhoods in our country. This is a critical issue in light of the alarming decrease in minority broadcast ownership since 1996. Today racial or ethnic minorities own just 7.24% of all full-power commercial broadcast radio stations, though they account for 33% of the U.S. population. For low power radio to ensure increased diversity on the airwaves, this vital resource must be available within the urban centers of every major city in the United States.

We therefore support the Prometheus Radio Project, REC Networks and Common Frequency in their proposal to strengthen the Commission's translator processing plan to better address the needs of urban areas. The Commission's current proposal evaluates a study area much too broad to ensure a robust urban LPFM service, an area which in most markets includes suburban, exurban, and regions with very low (and in some cases no) population. The recommendation advanced by Prometheus et al. relies on the Commission's proposed methodology but would more narrowly assess LPFM availability in urban areas, which have been denied the benefits of low power non-commercial radio service for decades.

Given this long wait for grassroots community groups seeking to operate low power stations, we laud the Commission's efforts to move swiftly towards the creation of new filing opportunities for LPFM. The Commission proposes to open an LPFM application filing window no later than summer 2012. While we share the Commission's interest in a timely filing window, we urge Commission staff to ensure adequate time for community groups to prepare. Grassroots community groups will need ample time to organize and raise funds for engineering studies once the rules for LPFM are published.

We thank the Commission for its efforts to expand low power FM radio, and we look forward to working together to create a robust, dynamic, and permanent community radio service in urban areas.

Sincerely,

National organizations

Alliance for Community Media
Asian American Justice Center
Center for Media Justice
Center for Rural Strategies
Consumers Union
Free Press
Future of Music Coalition
Institute for Local Self-Reliance
National Alliance for Media Arts and Culture
National Hispanic Media Coalition
New America Foundation's Open Technology Initiative
Pacifica Foundation
Prometheus Radio Project
Public Knowledge
Transmission Project
United Church of Christ

Local and regional organizations

Access Humboldt
CCTV Center for Media & Democracy (Burlington VT)
Chicago Media Action
Common Frequency
Esperanza Peace and Justice Center
First Voice Media
Generation Justice
Main Street Project
Media Alliance
Media Justice League
Medial Literacy Project
The Peoples Channel and Durham Community Media
PhillyCAM
Reclaim the Media
Media Mobilizing Project
People's Production House
Reel Grrls
Southwest Organizing Project

Wide Angle Youth Media
Youth Media Project

cc: Commissioner Clyburn
Commissioner Copps
Commissioner McDowell